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June 6, 2006

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *Notice of Ex Parte Presentation – CC Docket No. 96-115; RM 11277*

Dear Ms. Dortch:

This letter is to advise you that on behalf of Verizon Wireless, I met with Bill Dever, Adam Kirschenbaum, Jon Reel, Steve Rodini, and Tim Stelzig of the Wireline Competition Bureau to discuss the petition filed by the Electronic Privacy Information Center (“EPIC”).

In the meeting, we discussed the initiatives that Verizon Wireless has undertaken to train customer service representatives and file suits against data brokers. I emphasized that the Commission should only consider actions in this docket that will stop pretexters, and that many of the proposals in this proceeding such as an opt-in requirement for release of information to joint venture partners and independent contractors, encryption, and data retention would have no impact on pretexting. We discussed the reasons why a safe harbor is essential in this context because it would guide carriers’ practices without standardizing industry practices. We also discussed preemption, which is appropriate because it is impossible for wireless carriers to separate “interstate” and “intrastate” records for purposes of compliance with customer proprietary network information requirements.

Consistent with the Commission’s rules on *ex parte* communications, this letter is

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being filed electronically in the captioned docket. Please let me know if there are any questions related to this filing.

Very truly yours,

A handwritten signature in black ink, reading "Charon Phillips". The signature is written in a cursive style with a large, looping initial "C".

Charon Phillips

cc: B. Dever  
A. Kirschenbaum  
J. Reel  
S. Rodini  
T. Stelzig